REMARKS

Applicant and Applicant's representative thank the Examiner for the helpful and courteous comments in a recent telephone conversation regarding the pending Office Action.

Claims 1, 8, and 12 have been amended. Claims 1-20 are pending. Applicant reserves the right to pursue the original claims and other claims in this application and in other applications.

Claims 1-4 and 6, 7 and 12-20 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Flores. The rejection is respectfully traversed.

Claim 1 recites a method of creating a workflow process management application. The "workflow process management application, when executed by [a] computer, permits a user to: enter, for each department, a workflow plan for said department, receive a workflow performed by departments of said organization, create a report comparing said workflow plan with said workflow performed; and use said report to automatically generate subsequent worker assignments." Moreover, according to claim 1, "said workflow plan comprises a plurality of standards, each one of said standards inter-relating at least one activity object with at least one resource object as a function of time and skill level." Applicant respectfully submits that Flores fails to disclose the claimed invention.

As illustrated in Applicant's prior Amendment, Flores relates to a "workflow application builder" and is directed towards creating workflow and/or business maps. Flores Col. 2, l. 65 to Col. 3, l. 6. Flores repeatedly refers to its invention in terms of workflow and process maps. According to Flores, a primary workflow is linked to secondary workflows (labeled "serial" or "parallel"), which are designed to map out

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transactions (i.e., "sales") between customers and performers. These workflows are negotiated between the customer and performer during different phases of the Flores workflow loop. Flores Col. 3, l. 56 to Col. 4, l. 9.

Applicant respectfully submits, however, that Flores fails to disclose, teach or suggest a "workflow process management application, when executed by [a] computer, permits a user to: . . . create a report comparing said workflow plan with said workflow performed; and use said report to automatically generate subsequent worker assignments." Flores, by contrast, merely discloses observing the status of a transaction via status reports. Flores does not elaborate what these status reports contain. Flores does not disclose or suggest the ability to "create a report comparing said workflow plan with said workflow performed" or the ability to "use said report to automatically generate subsequent worker assignments." As such, Flores fails to disclose the claim 1 invention.

Moreover, as argued previously, Applicant respectfully submits that Flores fails to disclose "standards inter-relating at least one activity object with at least one resource object as a function of time and skill level" as required by claim 1. Initially, Applicant notes that Flores never contemplates, discloses or suggests inter-relating activities to resources based on "skill." Flores relates solely to negotiated transactions. The actual skill or skill level of the resource and/or the skill required for a transaction is never disclosed, nor contemplated in the Flores system (where all of the transactions are negotiated before hand). The portion of Flores referred to by the Office Action merely reflects a job and does not teach or suggest the claimed standards.

Moreover, Flores does not inter-relate standardized activities to resources based on time. The Flores "cycle" time, refers to a negotiated time for completion of a workflow from the initial proposal stage to the final satisfaction (i.e., acceptance by the

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customer) stage. This cycle time also includes time required to negotiate the transaction (i.e., proposal and agreement phases). Flores Col. 8, l. 65 to Col. 9, l. 4. The workflow plan of the present invention, by including a plurality of standards for inter-relating activities and resources (for performing activities) to each other as a function of time and skill, is therefore significantly different from anything taught or suggested by Flores. These skills, being part of a standard, are not negotiated. This important aspect of the claimed invention permits work to be appropriately planned in advance. For example, the workflow plan of the invention permits a user of the workflow management application to determine whether there are sufficient workers with the needed skills to perform the expected work. This feature is not disclosed or suggested by Flores at all.

Accordingly, Applicant respectfully submits that claim 1 is allowable over Flores. Claims 2-4, 6-7 and 14-20 depend from claim 1 and are allowable along with claim 1 for at least the reasons set forth above and on their own merits.

Claim 12 recites that "said workflow process management application defines acuities, each acuity including a set of activities that require a minimum skill level and/or licensure, and uses said acuities to determine worker assignments." There is no disclosure in Flores relating to acuities. As set forth in the claimed invention, "each acuity including a set of activities that require a minimum skill level and/or licensure." Flores does not disclose or suggest anything like the claimed acuities. Moreover, absent this teaching, Flores must also fail to disclose or suggest using "said acuities to determine worker assignments." Flores does not disclose assigning worker assignments in this manner. As such, Applicant respectfully submits that Flores fails to disclose the claim 12 invention. Claims 13-14 depend from claim 12 and are allowable along with claim 12 for at least the reasons set forth above and on their own merits.

Applicant respectfully submits that the rejection should be withdrawn and the claims allowed.

Claims 5 and 8-11 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Flores. The rejection is respectfully traversed.

Claim 5 depends from claim 1. Applicant respectfully submits that claim 5 is allowable along with claim 1 for at least the reasons set forth above and on its own merits.

Claim 8 recites "a web based application comprising a plurality of web pages and a plurality of database tables, said web based application being executable by a computer." According to claim 8, the computer, when executing the application, permits a user to "create a plurality of resource objects, each resource object being associated with at least one of said department objects and a production resource of said organization using a skill matrix." Moreover, according to claim 8, "said workflow process management application defines acuities, each acuity including a set of activities that require a minimum skill level and/or licensure, and uses said acuities to determine worker assignments." Applicant respectfully submits that none of the above limitations are shown or suggested by Flores.

In particular, Flores does not disclose, teach or suggest a skill matrix. The claimed invention, on the other hand, uses a skill matrix to relate a resource object with "at least one of said department objects and a production resource of said organization." This feature is simply not found in Flores. Furthermore, as noted above, Flores fails to teach or suggest "acuities" and using acuities to determine worker assignments. Thus, Applicant respectfully submits that claim 8 is allowable over
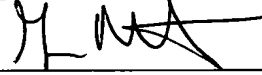
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Flores. Claims 9-11 depend from claim 8 and are allowable along with claim 8 for at least the reasons set forth above and on their own merits.

Applicant respectfully submits that the rejection should be withdrawn and the claims allowed.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

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Respectfully submitted,

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